

Courts  
CopyUnited States Dist. Court  
for the middle Dist. of Penna.William R. Branch  
Plaintiffvs.  
Mr. Russian, et. al.,  
Defendantnone to cr  
ORIginal Action No. 1:CV-00-1728

(Judge Conner)

Motion to Deny Summary JudgementFOR A Stay in Proceedings OR a Continuanceper Rules of federal Rules of Civil Proced-  
ure \*Rule 56(f), 26(a), 33(b)(3), 37.

If it's this most august court inmate CF-3756  
William Branch Housed at SCI Waymart Prays the  
 noble Judge Conner will Deny Defendants  
 motion for Summary Judgement. In that Pleadings  
 are not closed per court order Dated 1-7-04

as to genuine issue Defendants concede in  
 their Brief in support of their motion for Summ-  
 ary Judgement, on Page 19, 20 that I have already  
 satisfied the first and second prongs of Rausch.

I can establish a causal link between my  
 Protected activities and the adverse actions that  
 Defendants acknowledge in their statement of undis-  
 puted material facts. all I need is Discovery\* an  
 my Supplemental pleading, in the court well see  
 a pattern based on the timing of misconducts to  
 deny Paroles as well as Retaliiate against inmates  
 who Report their misconducts

Date 1-16-04 WmBranch CF-3756  
 There fore I ask that summary Pr. Rge 254  
 Judgment Be Denied Waymart Pa 18472

FILED  
HARRISBURG, PA  
JAN 23 2004MARY E. D'ANDREA  
Per  
Deputy Clerk

Motion To Deny Summary Judgement

Proof of Service

Ms Moreley esq  
Strawberry Sq 15 FL  
Harrisburg Pa. 17120

J. Comer  
Po Box 983  
Harrisburg Pa 17108

Verification

I affirm that the above is true under Penalty  
of the Law

Date 1-16-04

William Branch CF3756  
Po Box 256  
Waymart Pa 18472